

1 Craig C. Daniel (State Bar No. 212588)
2 **GLUCK DANIEL ATKINSON LLP**
3 201 Mission Street, Suite 1330
4 San Francisco, CA 94105
5 Telephone: (415) 510-2509
6 Email: litigation@gluckdaniel.com

7 Angela J. Somers (admitted *pro hac vice*)
8 Jeffrey E. Gross (admitted *pro hac vice*)
9 Minyao Wang (admitted *pro hac vice*)
10 **REID COLLINS & TSAI LLP**
11 420 Lexington Avenue, Suite 2731
12 New York, NY 10170
13 Telephone: (212) 344-5200
14 Facsimile: (212) 344-5299
15 Email: asomers@reidcollins.com
16 jgross@reidcollins.com
17 mwang@reidcollins.com

18 *Counsel for Plaintiffs Cedric de Lisser,
19 Christopher Moser, and Michael Michelin, in
20 their capacity as the Trustees of the Cred
21 Liquidation Trust*

22
23
24
25
26
27
28

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

29 CEDRIC DE LISSER, CHRISTOPHER MOSER,) Case No. 3:23-cv-00243-JD
30 and MICHAEL MICHELIN, in their capacity as)
31 the Trustees of the Cred Liquidation Trust,) [Removal from Superior Court of California,
32) County of San Francisco, Case No.
33) CGC-22603638]
34 Plaintiffs,)
35 v.)
36)
37 LOCKTON COMPANIES LLC, d/b/a)
38 LOCKTON INSURANCE BROKERS LLC,)
39 a Missouri limited liability company; LOCKTON) State Action Filed: December 22, 2022
40 COMPANIES, LLC- PACIFIC SERIES, d/b/a)
41 LOCKTON INSURANCE BROKERS LLC, a) Hearing Date: March 30, 2023
42 Missouri limited liability company; and DOES 1-) Hearing Time: 10:00 a.m. Pacific
43 10, inclusive.)
44 Defendants.)
45)
46 _____)

1 I, Angela J. Somers, pursuant to 28 U.S. Code § 1746, make the following declaration under the
2 penalty of perjury:

3 1. I am an attorney admitted to practice in the State of New York. I am a partner at Reid,
4 Collins & Tsai LLP, counsel to the Trustees (the “Trustees”) of the Cred Inc. Liquidation Trust (the
5 “Trust”) established in the chapter 11 bankruptcy cases of the above-captioned debtors. I am admitted
6 *pro hac vice* in this matter.

7 2. I submit this Supplemental Declaration in support of the Trustees’ *Reply to Defendants’*
8 *Opposition to Motion to Remand or in the Alternative for Equitable Remand*, filed concurrently herewith.

9 3. I have personal knowledge of the facts set forth herein and, if called as a witness, I could
10 and would testify competently to them.

11 4. Attached hereto as Exhibit 1 is a true and correct copy of the transcript of a hearing that
12 took place on July 19, 2022 in Case No. 20-12836 (JTD) in the United States Bankruptcy Court for the
13 District of Delaware.

14 5. Attached hereto as Exhibit 2 is a true and correct copy of the *Memorandum Opinion*,
15 entered by the United States Bankruptcy Court for the District of Delaware in Case No. 20-12836 (JTD),
16 dated February 27, 2023.

17 6. Attached hereto as Exhibit 3 is a true and correct copy of the transcript of a hearing that
18 took place on February 9, 2023 in Case No. 20-12836 (JTD) in the United States Bankruptcy Court for
19 the District of Delaware.

20 7. Attached hereto as Exhibit 4 is a true and correct copy of the *Declaration of Daniel Schatt*
21 *in Support of Debtors’ Chapter 11 Petitions and First Day Motions* filed on November 9, 2020 in Case
22 No. 20-12836 (JTD) in the United States Bankruptcy Court for the District of Delaware.

23 8. I declare that the foregoing is true and correct.

24 Executed in Greenwich, Connecticut on March 10, 2023.

26 _____
27 /s/ *Angela Somers*
28 Angela J. Somers